

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JULIE BALLOU,

Plaintiff,

v.

JAMES MCELVAIN, PH.D., in his individual
and representative capacity; and CITY OF
VANCOUVER, a municipal corporation,

Defendants.

CASE NO. 3:19-CV-05002-DGE

TRIAL EXHIBIT LIST

Exh	Description	Auth	Admiss	Obj	Admitted
1	COV Article II (Dep Ex. 176)	X		403 (issue of law)	NO
2	COV Article III (Dep Ex. 175)	X		403 (issue of law)	11/14/2023
3	COV Article XI (Dep Ex. 177)	X		403 (issue of law)	NO
4	VPD Policy 343 (Dep Ex. 19)		x		11/07/2023
5	VPD Policy Manual 902 ; IA Investigations (Dep Ex. 56)		x		11/07/2023
6	VPD IA Affairs Investigations Manual (Dep Ex. 57)		x		11/07/2023
7	Discipline guide from Policy Manual; Dep Ex 58		x		11/07/2023
8	COV Interview Panel Member Training (Dep Ex. 167)	x		402, 403 Def.'s MIL B.5	NO
9	VPD Policy Manual (Dep Ex. 141)		x		11/07/2023
10	Vancouver Municipal Code re Adoption of Personnel Policies (Dep Ex. 178)		x		11/07/2023
11	Vancouver Municipal Code re Administration (Dep Ex. 179)		x		11/07/2023
12	5/29/08: Olson Memo re Ballou complaint of sex harassment (Dep Ex. 154)	x		402, 403 Def.'s MIL B.2	NO
13	6/17/08: Dobbs Memo re Loudermill Hearing (Dep Ex. 156)			402, 403 Def.'s MIL B.2	NO
14	1/3/09: Ballou Email re Representation for IA Interview (Dep Ex. 155)	x		402, 403 Def.'s MIL B.2	NO
15	1/28/09: Landwehr Email re Failure to Report Complaint (Dep Ex. 157)	x		402, 403 Def.'s MIL B.2	NO
16	6/29/09: Sustained findings for failure to report harassment complaint by Ballou against Kipp; IAC 2008-282, (Dep Ex. 158)	x		402, 403 Def.'s MIL B.2	NO
17	Timeline of events by Kistler ; 2013-2019 (Dep Ex. 121)			402, 403, 602, 802, 901	NO
18	1/9/13: Kistler Email to Holmes, Mercier re ICMA Assessment (Dep Ex. 136)	x		402, 403, 404(b). 602 Def.'s MIL B.3	NO
19	1/25/13: Kistler Email to Sutter re Hostile Work Environment (Dep Ex. 138)	x		402, 403, 404(b) Def.'s MIL B.3	NO

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20	2013 Kistler Interview IAC 2013-0031 Notes (Dep Ex. 137)			402, 403, 404(b), 901 Def.'s MIL B.3	NO
21	5/15/13: Investigation Report re IAC 2013-0031 (Dep Ex. 170)	x		402, 403, 404(b) Def.'s MIL B.3	NO
22	1/14/14: Schuman Office Correspondence Re IAC 2013-0031 (Dep Ex. 194)	x		402, 403, 404(b), 802 Def.'s MIL B.3	11/09/2023
23	4/2/14: Chapman letter to McElvain re Watson Investigation (Dep Ex. 204)	x		402, 403, 404(b)	NO
24	5/6/14: McElvain Office Correspondence re Admin Review findings 2014-0001 (Dep Ex. 205)	x		402, 403, 404(b)	NO
25	5/7/14: Kistler Email to Sutter re John Key (Dep Ex. 139)	x		402, 403, 802	NO
25-1	5/7/14: Kistler Email to Sutter re John Key (Dep Ex. 139)				11/13/2023
26	2016: Luse memo re retaliation against Luse and Foster (Dep Ex. 73)			402, 403, 802, 901	NO
27	12/11/15: McNicholas rebuttal memo re investigation (Dep Ex. 34)	x		402, 403, 802	NO
28	4/22/16: Email from Columbian re Gender Disparities Within City of Vancouver (Dep Ex. 195)	x		402, 403, 802	NO
29	7/16/16: Foster Complaint to Holmes re sex discrimination and impact on IA (Dep Ex. 102)	x		402, 403, 802	11/14/2023
30	7/18/16: Kistler agreement with Foster re sex discrimination and impact on IA (Dep Ex. 103)	x		402, 403, 802	11/14/2023
31	9/23/16: Kistler objection to Marcella Reed IA because bias re Foster (Dep Ex. 104)		X		11/07/2023
32	9/8/16: Emails with King and Kistler re distrust at VPD. (Dep Ex. 108)		x		11/07/2023
33	1/2017 – 12/31/19: City of Vancouver and VPG Agreement (Dep Ex. 184)		x		11/07/2023
34	1/20/17 King notes of meeting w Holmes re sex discrimination (Dep Ex. 109)		x		11/07/2023
35	3/19/17: Email from citizen to Ballou re Days Inn Hotel (Dep Ex. 7)		x		11/07/2023
36	3/20/17: MFR Report into Foster and Kistler complaints of sex discrimination and retaliation against McElvain (Dep Ex. 33)		x		11/07/2023

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37	3/27/17: Report to McElvain re Report on Gender issues raised by Kistler and Foster (Dep Ex. 107)		x		11/07/2023
38	3/28/17: Amended IAC 2017-0027 to Trumpf for failing to take action on report of crime (Dep Ex. 23)		x		11/07/2023
39	Trumpf response to IAC 2017-0027 (Dep Ex. 24)		x		11/07/2023
40	6/12/17: Musser report re Skeeter “training incident” (Dep Ex. 36)	x		402, 403 Def. MIL B.4	NO
41	7/14/07: King notes of meeting with Holmes (Dep Ex. 110)	x		402, 403, 601, 802	NO
42	9/5/17: Musser interview regarding report against Skeeter (IAC 2017-0062 (Dep Ex. 37)	x		402, 403, 613 Def. MIL B.4	NO
43	10/31/17: Findings re Musser Complaint against Skeeter; 2017-0062 (Dep Ex. 38)	x		402, 403 Def. MIL B.4	11/8/2023
44	12/8/17: Email Exchange re Panel Training Observations re Hamlin (Dep Ex. 150)	x		402, 403 Def. MIL B.5	NO
45	12/13/17: Letter re IAC 2017-0061 (Dep Ex. 172)	x		402, 403 Def. MIL B.4	11/08/2023
46	12/19/17: Rodriguez Email re Panel Member Training (Dep Ex. 151)	x		402, 403 Def. MIL B.5	NO
47	2/26/18 NOI for IAC 2018-34 – Ballou (Dep Ex. 3)		x		11/07/2023
48	9/6/17: Foster Email to Sutter opposing sex discrimination by Hamlin in Libbey promotion process (Dep Ex. 51)	x		402, 403 Def.’s MIL B.7	NO
49	11/15/17: Sgt Eligibility List (Dep Ex. 21)		x		11/07/2023
50	11/21/17: Debra Quinn Complaint against City of Vancouver et al. (Dep Ex. 202)	x		402, 403, Def.’s MIL B.1	NO
51	11/25/17: CAD call for Burglary call at residence (Dep Ex. 22)		x		11/07/2023
52	12/6/17: Report about Hamlin’s opposition to bias training (Dep Ex. 106)			402, 403, 901 Def. MIL B.5	NO
53	2/12/18 IAC 2018-34; Trumpf IA against Ballou re not writing report for residential burg (Dep Ex. 49)		x		11/07/2023
54	IA findings 2018-31 (Musser 2/17/18 Complaint against Ballou re JC Penny (Dep Ex. 41)		x		11/07/2023
55	2/22/18: Email to King and Luse re major complaint re Ballou (Dep Ex. 113)		x		11/07/2023

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56	2/28/18: Foster interview IAC 2017-115 (Dep Ex. 105)	x		402, 403, 613 Def.'s MIL B.7	NO
57	2/23/18: Email from Kennedy to King and others re IAC 2018-34 not being "major: (Dep Ex. 75)		x		11/07/2023
58	3/1/18: NOI for IAC 2018-31) (JC Penny) Ballou (Dep Ex. 40)		x		11/07/2023
59	3/2/18: Foster email to Sutter re No report from Ruder (Dep Ex. 98)		x		11/07/2023
60	3/2/18: Emails re Report for Ruder's Rape call and Firstwatch (Dep Ex. 60)		x		11/07/2023
61	3/2/18: Ruder Report re Rape call (Dep Ex. 118)		X		11/07/2023
62	3/26/18: King email to staff re Firstwatch (Dep Ex. 61)		x		11/07/2023
63	4/7/18: Sgt Johns NOI re IAC 2017-0125 (Dep Ex. 144)		x		11/07/2023
64	4/25/18: Kipp Email to Ballou re Subject of IAC 2018-0034 (Dep Ex. 142)		x		11/07/2023
65	4/25/18: McElvain Email re Investigation Method (Dep Ex. 152)	x		402, 403 Def.'s MIL B.7	NO
66	4/26/18: Lester, King and Kistler email re no reports in Firstwatch (Dep Ex. 63)		x		11/07/2023
67	4/26/18: Sutter and Lester email re no reports for burglaries (Dep Ex. 62)	x		403, 602	11/13/2023
68	5/2/18: Foster email opposing sex discrimination in IA process and workplace rules (Dep Ex. 54)	x		402, 403 Def.'s MIL B.7	11/20/2023
69	5/8/18; IA Interview by Barb Kipp of Ballou (Dep Ex. 5)		x		11/07/2023
70	5/12/18 Emails with Olson ad Ballou re report for Victoria's Secret (Dep Ex. 8)		x		11/07/2023
71	5/17/18: King assigns Luse as decisionmaker for Ballou IAs 2018-34 and minor (Dep Ex. 76)		x		11/07/2023
72	5/31/18: Ballou response to IA 2018-34 (Dep Ex. 4)		x		11/07/2023
73	6/11/18: King provides input on Luse findings on Ballou (Dep Ex. 78)		X		11/07/2023
74	6/11/18: King sends Legal and Chiefs office proposed disc for Ballou (Dep Ex. 80)	x		402, 403, 602	NO
75	6/12/18: AC meeting re 2018-34 IA (Dep Ex. 82)		x		11/07/2023

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76	6/13/18 Notice of Findings for IAC 2018-34 and 2018-74 (Dep Ex. 6)		x		11/07/2023
77	6/14/18: Notice of Personnel Action IAC 2018-34 (Dep Ex. 10)		x		11/07/2023
78	6/14/18: Email re Ballou not requesting Loudermill (Dep Ex. 85)		x		11/07/2023
79	6/14/18: Email by King re final findings (Dep Ex. 86)		x		11/07/2023
80	6/26/18: King and Lester email re no reports (Dep Ex. 68)	X		402, 403, 602, 802	NO
81	7/2/18: King email to Ballou to attend training as a supervisor (Dep Ex. 111)		x		11/07/2023
82	7/2/18: Add'l King Email with Ballou re promotion and training (Dep Ex. 112)		x		11/07/2023
83	7/3/18: McElvain Email promoting Jennings to Sergeant (Dep Ex. 70)		x		11/07/2023
84	7/3/18: McElvain email re Ruder, Ballou and discrimination (Dep Ex. 66)		X		11/07/2023
85	7/4/18: NOI to Ruder for IAC 2018-115 (Dep Ex. 117)		x		11/07/2023
86	7/9/18: Ballou email with Holmes and McElvain opposing failure to promote / sex discrimination (Dep Ex. 11)		x		11/07/2023
87	7/19/18 Emails w Ballou and McElvain re promotion decision (Dep Ex. 1)		x		11/07/2023
88	7/30/18: Chief Training Bulletin re report writing (Dep Ex. 65)	X		407	11/07/2023
89	7/30/18 Email between Olson and Michelson re adjustment of offense code (Dep Ex. 124)			602, 802, 901	NO
90	7/18 Olson investigation of Ballou's complaint re double standards (Dep Ex. 165)		x		11/07/2023
91	Incident Reports re calls with no reports (Dep Ex. 20)			602, 802, 901	NO
92	Notes of IA interview with Price re 2018-115 / Ruder (Dep Ex. 90)		X		11/07/2023
93	8/17/18: King Interview with re Ruder IA for no report (IAC 2018-115) (Dep Ex. 69)	x		613	NO
94	8/28/18: McElvain Interview w Bolasina re IAC 2018-0120 (Dep Ex. 201)		x		11/07/2023
95	9/17/2018: Trumpf statement to Bolasina about IA (Dep Ex. 26)	x		613	NO
96	9/17/18: Lester interview with Bolasina re IA (Dep Ex. 64)	x		613	NO

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97	9/19/18 note re complaint by Ballou about Trumpf “not needing another harassment complaint.” (Dep Ex. 31)			602, 802, 901	NO
98	9/20/18: Jeff Olson Statement (Dep Ex. 164)	x		613	11/14/2023
99	9/21/18: Price Interview re IAC 2018-0115 (Dep Ex. 168)	x		613	NO
100	9/26/18: Foster IA interview re IAC 2018-115 (Dep Ex. 96)	x		613	NO
101	9/28/18: King interview with Bolasina (Dep Ex. 67)	x		613	NO
102	9/28/18: Foster Interview with Bolasina re Ballou complaint of discrimination (IAC 2018-0120 and 0121) (Dep Ex. 95)	x		613	NO
103	Bolasina Billing Statements (Dep Ex. 200)		x		11/07/2023
104	10-5-18: Ruder IA Interview re IAC 2018-115 (Dep Ex. 119)	x		613	NO
105	10/18/18: NOI re IAC 2018-0175 (Dep Ex. 146)		x		11/07/2023
106	10/18/18: Report re IAC 2018-175 against Ballou and skeeter re Facebook posts (Dep Ex. 42)		X		11/07/2023
107	10/19/18: Kipp Statement (Dep Ex. 143)	x		613	11/16/2023
108	10/19/18: NOI re IAC 2018-0175 (Dep Ex. 173)		X		11/7/2023
109	10/22/18: Kistler IA Interview re IAC 2018-120, 121 (Dep Ex. 122)	x		613	NO
110	10/25/18: NOI re IAC 2018-0180 (Dep Ex. 145)		x		11/07/2023
111	10/25/18: Sutter Interview Notes re Ballou (Dep Ex. 153)	x		613, 802	NO
112	11/6/18: Musser Interview re IAC 2018-075 (Dep Ex. 43)		x		11/07/2023
113	11/15/18: Sutter Interview Notes (Dep Ex. 149)	x		403, 802 Def.’s MIL B.7	NO
114	18: Kistler notes for Bolasina Interview (Dep Ex. 123)			802, 901	11/09/2023
115	11/15/18: Luse statement to Bolasina: (Dep Ex. 87)	x		403, 802	NO

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116	11/16/18: IAC Final Report on Ruder IAC (Dep Ex. 91)		x		11/07/2023
117	11/28/18: Rodriguez Follow-Up to Dean Investigation Report (Dep Ex. 189)	x		403, 802 Def.'s MIL B.6	NO
118	11/30/18: Kistler Email to Holmes re IAC 2018-0194 (Dep Ex. 182)	x		403, 802	11/09/2023
119	12/5/18: Le forwards HR concerns of Hamlin using IA process to retaliation against Foster for opposing gender bias (Dep Ex. 100)	x		403, 802	NO
120	12/5/18 (Le emails to HR and Legal re Foster's complaint of retaliatory IA's filed against her re Libbey (Dep Ex. 52)	x		403, 802	NO
121	12/6/18: Foster Description of Disparate FTO/SO Findings (Dep Ex. 125)			403, 613, 802, 901	NO
122	12/6/18: Hatley Response to IAC Assignment for Kistler Complaint (Dep Ex. 126)			403, 602, 802, 901	NO
123	12/6/18: Kistler Complaint IAC 2018-0200 (Dep Ex. 127)	x		403, 602 Def.'s MIL B.7	NO
124	12/14/18: Foster Complaint against Chief for retaliation for (Dep Ex. 53)	x		403 Def.'s MIL B.7	NO
125	12/14/18: Foster Emails to Holmes re IAC 2018-0194/2018-0201 (Dep Ex. 128)	x		403 Def.'s MIL B.7	11/09/2023
126	12/14/18: Kistler Email to Holmes re Second Investigation IAC 2018-0194 (Dep Ex. 129)	x		403 Def.'s MIL F	11/09/2023
127	12/17/18: Foster Email to Holmes re IAC 2018-0194 (Dep Ex. 183)	x		403 Def.'s MIL B.7	11/09/2023
128	12/21/18: Memo to McElvain re 2018-207 (involving numerous IAs re Foster, Libbey and discrimination.) (Dep Ex. 50)	x		403 Def.'s MIL B.7	NO
129	12/21/18: NOI to Chief based on Foster discrimination and retaliation complaint (Dep Ex. 99)	x		403 Def.'s MIL B.7	NO
130	1/3/19: IA Interview of Musser re retaliation complaint against Ballou for IAC 2018-175 (Dep Ex. 46)		x		11/07/2023
131	1/3/19: Ballou Complaint for Deprivation of Civil Rights (Dep Ex. 206)	x		403	NO
132	2/21/19: Skeeter Email re IAC 2017-0061 re Musser (Dep Ex. 174)	x		403, 802	NO
133	3/6/19: Bolasina Report re Ballou IA against Trumpf and McElvain (Dep Ex. 27)	x		403	11/14/2023

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134	3/9/19: Anonymous IA complaint against Ballou for statements in newspaper re lawsuit (Dep Ex. 29)			403, 602, 802 Def.'s MIL D	11/07/2023
135	3/28/19: Holmes Memo re Ballou Investigation Findings (Dep Ex. 181)		x		11/07/2023
136	3/29/19: King findings to Musser re Retaliation against Skeeter for IA 2017-0062 (Dep Ex. 47)		x		11/07/2023
137	4/2019: Luse notes on IA 2018-180 – Ballou no report: Dep Ex 93)	X		613, 802	11/16/2023
138	4/15/19: Complaint IAC 2019-0070 (Dep Ex. 188)	X		402, 403	NO
139	4/23/19: Kistler Email to Holmes Re Withdrawal of Complaints and Method of Investigation (Dep Ex. 131)	X		Def.'s MIL F	11/09/2023
140	4/23/19: Foster Email to Holmes Re Withdrawal of Complaints and Method of Investigation (Dep Ex. 132)		X		11/7/2023
141	5/8/19: Skeeter Office Correspondence re IAC 2018-0175 (Dep Ex. 171 and 44)	x		403, 802	NO
142	4/15/19: Luse IA report re Ballou (Dep Ex. 92)		X		11/7/2023
143	5/23/19: Ballou Metadata (Dep Ex. 187)			403, 602, 802, 901	11/7/2023
144	withdrawn				NO
145	6/4/19: Holmes email to Foster Kistler re May 2019 meeting w Holmes. (Dep Ex. 101)		X		11/9/2023
146	6/13/19: Lofton Investigation Report re IAC 2019-0038 (Dep Ex. 186)	x		403 Def.'s MIL D	11/8/2023
147	6/21/19: Luse findings on Musser Dishonesty findings (Dep Ex. 94)	X		403	NO
148	7/26/19: Release of Confidential Information IAC 2018-0070 (Dep Ex. 135)	x		403	NO
149	7/24/19: Ballou Grievance re IAC 2018-38 (Dep Ex. 162)	X		403	NO
150	7/25/19: Hale Interview with McElvain re IAC 2019-0069 (Dep Ex. 207)	X		403	11/14/2023
151	7/30/19: Foster Email to Holmes re Complaint Withdrawals (Dep Ex. 134)		X		11/07/2023
152	7/31/19: anon complain of Sexist comments by Evans; 2019-0113 (Dep Ex. 39)			402, 403, 602, 802 Def.'s MIL D	11/09/2023

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153	7/31/19: IAC report 2019-113 (Dep Ex. 88)	X		402, 403, 802 Def.'s MIL D	NO
154	8/6/19: King Notice of Findings to Ballou in IA 2018-206 re retaliation for Musser's IA 2018-175 (Dep Ex. 45)		X		11/07/2023
155	10/9/19: Hale Investigation Report re IAC 2019-0070 (Dep Ex. 185)		X		11/07/2023
156	11/6/19: Viles and Gomez promoted to Sgt (Dep Ex. 71)	X		402, 403	NO
157	2019: Findings by Shayda Le re retaliation complaints by Foster re Hamlin, Libbey, etc. IA 2018-70 and 75 (Dep Ex. 32)	X		402, 403 Def.'s MIL 7	11/09/2023
158	1/21/20: Foster Email re Michelson Complaint/Memo (Dep Ex. 208)	X		402, 403, 802	NO
159	2/7/20: Neal Office Correspondence re IAC 2020-0009 (Dep Ex. 209)	X			NO
160	2018; Investigation summary for IAC 2018-0115 (Ruder) (Dep Ex. 89)		X		11/7/2023
161	10/7/08: Ballou Assessment (Dep Ex. 192)		X		11/7/2023 withdrawn
162	7/7/18: Ballou Diagnosis and Treatment Plan (Dep Ex. 193)		X		11/7/2023 withdrawn
163	Damages Summary / Stipulation			Never Provided LCR 16(h)	NO
164	Damages documentation			Never Provided LCR 16(h)	NO
165	2/10/21: Reeves Report			402. 403, 802 Def.'s MIL B.8	NO
166	Undated draft of Reeves Report			402. 403, 802 Def.'s MIL B.8	NO
167	First Notice of Tort Claim		X		11/07/2023
168	Second Notice of Tort Claim		X		11/07/2023
500	2008-077 Notice of Findings (Kistler to Jennings) (COV034627-034628)			401-403	NO
501	2014 Lt Eligibility List (COV003023)	x		401-403	NO
502	October 2014 CSC Eligibility List for Corporal (COV003024)	x		401-403	NO
503	July 13, 2015 Letter of Appreciation to Ballou and others from McElvain (COV018268)		x		11/07/2023

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504	July 23, 2015 Email re Junker promotion ceremony		x		11/07/2023
505	IAC 2015-0085 Findings October 26, 2015 (COV024728-33)	x		401-403; 805	NO
506	IAC 2015-0209 Notice of IA April 6, 2019		x		11/07/2023
507	IAC 2015-0209 Findings re R. Junker		x		11/07/2023
508	October 4, 2016 email Ballou to McElvain re Beards [Dep. Ex. 114]	x		401-403	11/14/2023
509	March 21, 2017 email Ballou and Yim, Sweet Factory (COV001836)		x		11/07/2023
510	March 21, 2017 email Ballou to VPD Guild re the “other dirty bird” (COV001838, 001838a-001838c)		x		11/07/2023
511	April 18, 2017 Ballou Policy Acknowledgement (COV017900)	x			11/15/2023
512	April 28, 2017 Letter of Appreciation to Ballou and others from McElvain (COV018266)		x		11/07/2023
513	June 25, 2017 letter from J. Singleton re Ballou treatment (DF2 200224)	x		401-403: 803-4	NO
514	IAC 2017-0027 Findings December 4, 2017 (COV007776-77)	x		401-403.	NO
515	IAC 2017-0115 and IAC 2018-0075 Undetermined letter (COV012294)		x		11/07/2023
516	IAC 2017-0125 Personnel Investigation (COV006910-46)	x		401-403; 805	11/15/2023
517	IAC 2017-0125 PSU Summary (COV006910-56)	x		401-403	NO
518	IAC 2017-0125 Sustained Findings Letter Report Writing O’Meara (COV006672-75)	x		401-403	11/15/2023
519	IAC 2017-0125 Notice of Personnel Action June 1, 2018 (COV006678-81)	x		401-403	11/20/2023
520	Nov. 21, 2017 email re draft 902 policy. Olson to McElvain (COV045649)	x		401-403	NO
521	February 2, 2018 Pemco policy DP1403905 – Nonrenewal Notice	x		401-403; 608	NO
522	February 2, 2018 Pemco policy HO1072588 – Nonrenewal Notice			401-403; 608	NO
523	March 2, 2018 Ballou Sergeant Mentoring Assignment (COV018289)		x		11/07/2023

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524	March 5, 2018 Notice re Acting Sergeant Assignment (COV018288)		x		11/07/2023
525	April 13, 2018 Hamlin Retirement Notice (COV033372)	x		401-403	NO
526	April 18, 2018 email McElvain to VPD all re Dumas and Krebs promotions (COV090910)		x		11/07/2023
527	April 27, 2018 Ballou completion of Sergeant Mentoring (COV018287)		x		11/07/2023
528	May 2, 2018 Letter of Appreciation McElvain to Ballou (COV018264)		x		11/07/2023
529	McElvain handwritten notes re Ballou IA (COV035322-23)		x		11/07/2023
530	July 10, 2018 Email McElvain to Takach Fw Solutions (Ballou email)		x		11/07/2023
531	July 12, 2018 Documentation of Discussion McElvain to Lester (COV035431-33)		x		11/07/2023
532	IAC 2018-0027 Notice to Ruder (COV009092-93)		x		11/07/2023
533	IAC 2018-0121 Trumpf Response (COV007939-40)	x		401-403 802-3	11/15/2023
534	October 18, 2018 email McElvain to Barton re Promotion Ceremony (COV109504)		x		11/07/2023
535	October 18, 2018 email McElvain to VPD re Barton promotion ceremony (COV091519)		x		11/07/2023
536	IAC 2018-180 Email notice/exchange Kipp and Ballou October 31, 2018 (DFC 2179)	x		FRE 401-403	NO
537	IAC 2018-180 PSU Summary (COV002807-002836)		x		11/07/2023
538	IAC 2018-0180 PSU Supplemental Summary (COV002837)		x		11/07/2023
539	March 26, 2019 Luse email to Kipp re IAC 2018-0180		x		11/07/2023
540	IAC 2018-0180 Ballou Interview Transcript Dec. 5, 2018 (COV002747-75)		x		11/07/2023
541	IAC 2018-0175 Findings Ltr from T. Ryan to J. Ballou		x		11/07/2023
542	Ballou Husband Beater Photo (COV 2534)		x		11/07/2023

Exh	Description	Auth	Admiss	Obj	Admitted
543	IAC 2018-0182 Notice of Investigation Social Media (COV007168-71)		x		11/07/2023
544	IAC 2018-0182 Notice of Findings to Musser (COV007139-41)		x		11/07/2023
545	IAC 2018-0182 [Loudermill Hearing Response Musser to Kipp (COV002841-42)		x		11/07/2023
546	Facebook photos found by Ballou (COV002911-13)			401-403	NO
547	Notice of Investigation for IAC 2018-0196 to Boynton (COV002947-48)		x		11/07/2023
548	Notice of Investigation for IAC 2018-0196 to Hatley (COV 2955-56)		x		11/07/2023
549	Notice of Investigation for IAC 2018-0196 to Knotts (COV002960-61)		x		11/07/2023
550	IAC 2018-0196 against Boynton Unfounded (COV002916-17)		x		11/07/2023
551	IAC 2018-0196 against Hatley Unfounded (COV002918-19)		x		11/07/2023
552	IAC 2018-0196 against Knotts Unfounded (COV002914-15)		x		11/07/2023
553	IAC 2018-0206 Notice of Investigation to Ballou (Musser complaint Harassment) (COV008985-87)		x		11/07/2023
554	IAC 2018-0175 Kipp to Ballou December 8, 2018 [Notice of Investigation for (COV002544-45)		x		11/07/2023
555	December 31, 2018 Letter of Appreciation to Ballou from McElvain (COV018284)		x		11/07/2023
556	January 10, 2019 email McElvain to Ruder re Promotion (COV109599)		x		11/07/2023
557	January 10, 2019 email from McElvain re Ruder promotion (COV099657)		x		11/07/2023
558	Redacted January 10, 2019 email J. Young to others attaching summons and complaint (COV 173530-42)		X – if unredacted		11/07/2023
559	April 16, 2019 email exchange between McElvain and Ballou re Promotion (Dkt. 42-9)		x		11/07/2023
560	IAC 2019-0038 Lofton Investigation Report *subject to motion in limine		x		11/07/2023

Exh	Description	Auth	Admiss	Obj	Admitted
561	IAC 2019-0038 Letter of findings Unfounded *subject to motion in limine		x		11/07/2023
562	IAC 2019-0070 Notice of findings (COV124624-31) *subject to motion in limine			FRE 401-403	NO
563	March 17, 2020 McElvain to VPD re A message from the chief *subject to motion in limine			FRE 401-403	NO
564	IAC 2021-0091 McElvain notice of Investigation *subject to motion in limine	x		FRE 401-403	11/09/2023
565	IAC 2021-0091 Hale Investigation Report dated 01-31-2022 *subject to motion in limine	x		FRE 401-403	NO
566	Ballou Text Messages (Excerpts of DFC 3727 / Dep. Ex. 12)	X		FRE 401-403; FRE 805	NO
567	PSU Spreadsheet of IAs (2012-2015) (COV 67568-83)			FRE 401-403.; 901	NO
568	PSU Spreadsheet of IAs (2016-2019) (COV 67584-629)			FRE 401- 403;901	NO
569	PSU Chart Data (prepared by J. Elliott) (Dkt. 62 at 5-7)			FRE 401-403; 901	NO
570	City of Vancouver Policy 307 (Harassment)				NO
571	VPD Code of Ethics (from VPD Policy Manual)		X		11/07/2023
572	Julie Ballou Oath of Office (11/15/05) (COV018260)		x		11/07/2023
573	Text messages between Plaintiff and Missy Skeeter	X			11/07/2023
574	Text messages between Plaintiff and Amy Foster	X			11/07/2023
575	Text messages between Plaintiff and Ryan Junker	X			11/07/2023
576	Text messages between Plaintiff and Thomas DeMarco	X			11/07/2023
577	Text messages between Plaintiff and Patrick Kennedy	X			11/08/2023
578	Text messages between Plaintiff and Sharon Ricks, Beth Graves, Brandy Ostrom	X			11/08/2023
579	Text messages between Plaintiff and Michael Maini	X			11/08/2023

Exh	Description	Auth	Admiss	Obj	Admitted
580	Text messages between Plaintiff and Zachary Ripp	X			11/07/2023
581	Findings Letter re IAC 2018-0175				NO
582	Transcript of Miranda Skeeter Interview				NO
583	List of stolen items made by husband of Jan Adkins-Pont				NO
584	Tally of promotions				NO
585	8/27/2016 Email from Julie Ballou				NO